

11/16/2009

1214781 - R8 SDMS



Re: Conditional Approval for the Work plan at Former LaQuinta Property

Joyce Ackerman to: Dale Urban

11/16/2009 12:48 PM

Cc: "Craig Barnitz", "David Wilson", "Robert Schmidt"

Bcc: Joyce Ackerman

From: Joyce Ackerman/R8/USEPA/US

To: "Dale Urban" <durban@utah.gov>

Cc: "Craig Barnitz" <cbarnitz@utah.gov>, "David Wilson" <David.Wilson@erm.com>, "Robert Schmidt" <Robert@pegdevelopment.com>

Bcc: Joyce Ackerman/R8/USEPA/US

David - EPA concurs with the conditional approval set forth below. This e-mail serves as EPA's written conditional approval.

Joyce Ackerman, On-Scene Coordinator
EPA Region 8
1595 Wynkoop St.
Denver, CO 80202
Phone: 303-312-6822

"Dale Urban"

David;

11/16/2009 12:10:40 PM

From: "Dale Urban" <durban@utah.gov>

To: "David Wilson" <David.Wilson@erm.com>

Cc: Joyce Ackerman/R8/USEPA/US@EPA, "Robert Schmidt" <Robert@pegdevelopment.com>, "Craig Barnitz" <cbarnitz@utah.gov>

Date: 11/16/2009 12:10 PM

Subject: Conditional Approval for the Work plan at Former LaQuinta Property

David;

This conditional approval email will be followed up with a written approval letter from UDEQ for file tracking purposes. EPA should send you an email regarding this matter as well, but I don't know if Joyce will follow up with a letter, or just let the email suffice for the written approval anticipated by the environmental covenant. Either way, once you get EPA's approval for the work plan, you may proceed at your convenience with the geotechnical work as proposed or modified by this conditional approval.

----- conditional approval follows

This email will be considered as the conditional approval for the *Work Plan for Intrusive Investigations, Former LaQuinta property* located at 100 South 300 West, Salt Lake City, Utah, dated November, 4 2009, submitted by ERM on behalf of EA Land Investment, LLC. The work plan was submitted to the Utah Department of Environmental Quality (UDEQ) and to the U.S. Environmental Protection Agency (EPA) in accordance with the existing environmental covenant for the above-referenced property.

- While approval of the submitted Work Plan approves the methods for any Intrusive Investigations at the site using geoprobe (direct-push) and hollow-stem auger, the UDEQ and EPA require additional notification prior to any future direct-push or drilling work for environmental or geotechnical purposes beyond what is described in Figure 2.
- If environmental samples are to be collected from the former LaQuinta property, the UDEQ and EPA require that the samples be analyzed for Libby amphibole asbestos, in addition to any other environmental testing that may be performed for volatile organics, semi-volatile organics, halogenated compounds, metals, etc. Prior to the collection of any environmental samples, ERM is required to submit information to the UDEQ and EPA regarding sampling methods and laboratory analytical methods to be used in the collection and analysis of the environmental samples.
- For any sampling conducted adjacent to the Pacificorps (aka Rocky Mountain Power) substation property, all soil cuttings generated from 0-20 feet below ground surface (bgs) from test holes or borings will need to be containerized and disposed of as asbestos containing material (ACM). This requirement would apply to the borings B-6 and B-7 as shown in Figure 2.
- For any test holes or borings not adjacent to the Pacificorps property, the soil cuttings generated from 0-15 feet bgs are subject to be containerized and disposed of as ACM.
- All decontamination or waste water generated at the site during the geotechnical drilling phase of work described in the Work Plan will need to be containerized and disposed as ACM. Disposal options include obtaining a permit from Salt Lake City and after filtering the waste water, discharging it to the sanitary sewer, or taking the waste water to a landfill that can accept ACM. The waste water would include any water generated during the decontamination of any drilling equipment, sampling equipment, or PPE exposed to subsurface soils inside the property boundary. No on-site disposal is currently approved since there is no significant exposed area of impacted soils to allow for the contaminated water to be thin spread on the soils. Once the cover is breached for major earth work in the future, then on-site waste water disposal would be considered acceptable provided it was spread out only on asbestos-impacted soils as discussed.
- Any workers on-site during the completion of the activities described in the Work Plan will need to have received certification under OSHA Hazwoper CFR 1910.120 to allow for wearing of respirators during site work. Workers shall also be properly informed of all on-site hazards prior to commencing work.

If you have any questions regarding this conditional approval, please contact us for clarification. Thank you for your assistance in this matter.

Dale T. Urban, P.G.
Site Assessment Section Manager

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urban@utah.gov